

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

CATHERINE ALEXANDER,)	
)	
Plaintiff,)	
)	Case No: 3:18-cv-0966-MJR-DGW
v.)	
)	JURY TRIAL DEMANDED
TAKE-TWO INTERACTIVE SOFTWARE, INC.;)	
2K GAMES, INC.; 2K SPORTS INC.;)	
WORLD WRESTLING ENTERTAINMENT,)	
INC.; VISUAL CONCEPTS ENTERTAINMENT;)	
YUKE'S CO., LTD.; and YUKE'S LA INC.,)	
)	
Defendants.)	

**PLAINTIFF'S MEMORANDUM IN OPPOSITION TO WORLD WRESTLING
ENTERTAINMENT, INC.'S MOTION TO STAY DISCOVERY**

Plaintiff hereby opposes the defendant's motion to stay. The first few pages of defendant's motion have nothing to do with the stay and relate to the motion to dismiss for personal jurisdiction. Plaintiff will respond to those arguments in opposition to the motion to dismiss for personal jurisdiction.

Contrary to WWE's argument, the motion to dismiss will not resolve the case. All that will do is require the case against WWE to be filed elsewhere. That does not resolve the case. In addition, wherever the case is heard against WWE, the same discovery will have to be undertaken. Therefore, it is not prejudicial to WWE to require it to respond to discovery. In fact, WWE has already participated in discovery so far in this case. In addition, other defendants that filed motions to dismiss in this case did not join in WWE's motion to stay.

WWE's argument that Plaintiff will not be prejudiced by a stay is also incorrect. There already are deadlines in this case that have past and others that are coming very soon. For example, Plaintiffs are required to disclose expert witnesses on November 15, 2018. Plaintiff's

experts will be required to review discovery from WWE and other defendants before being able to prepare their reports. Thus, if WWE is not required to respond to discovery it will impact Plaintiff's ability to meet the other deadlines in the case and thereby prejudice the Plaintiff.

Therefore, Plaintiff respectfully requests that WWE's motion to stay the case pending resolution of the motion to dismiss be denied and for such other relief as the Court deems just and proper.

Dated: October 25, 2018

Respectfully submitted,

THE SIMON LAW FIRM, P.C.

/s/ Anthony G. Simon

Anthony G. Simon, IL 6209056
Benjamin R. Askew, IL 6291366
Anthony R. Friedman, IL 6299795
800 Market Street, Suite 1700
St. Louis, Missouri 63101
Phone: (314) 241-2929
Fax: (314) 241-2029
asimon@simonlawpc.com
basekew@simonlawpc.com
afriedman@simonlawpc.com

R. Seth Crompton
THE HOLLAND LAW FIRM
300 N Tucker, Suite 801
St. Louis, Missouri 63101
scrompton@allfela.com
Phone: (314) 241-8111
Facsimile: (314) 241-5554

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon all counsel of record this 25th day of October, 2018 via the Court's CM/ECF system.

/s/ Anthony G. Simon